REMARKS

Claims 1-30 are pending in the above-referenced patent application. Claims 1, 14, 29 and 30 are independent claims.

Applicant notes that correspondence in this matter was misdirected by the Patent Office to MetaEdge Corporation of Santa Clara, CA, in error. Applicant asks that all correspondence continue to be directed to the undersigned attorney in Boston, MA as this application is assigned to iPhrase, Inc. and not MetaEdge Corporation, whom applicant has never heard of.

The examiner uses Khan and Appelt to reject claims 1, 7-12, 14 and 25-30 as having been obvious.

Claims 1, 14, 29 and 30 recite "outputting a prose rendition of the query text," or similar language. At least this quoted claim feature is totally absent from the cited references.

The examiner admits that Khan fails to disclose this quoted claim feature and looks to Appelt to provide for this deficiency.

Appelt does not help. The examiner directs applicants to col. 3, lines 20-25. However, these quoted lines only teach that *relevant portions of located documents, after* a search is completed, can be highlighted and/or summarized. More specifically, the lines referred to by the examiner disclose:

> **The query reply generator can create a summary of the output for each document in a group of documents. The query reply generator can quote a relevant portion of each located document in a summary or can annotate the output by group in a summary. The query reply generator can also highlight a relevant portion in each located document. (emphasis added)**

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This is very different from outputting a prose rendition of the query text, as claimed in applicant's claims. Appelt receives a natural language query as input while applicant's claimed invention receives query text as input:

> Once the system 100 receives a natural language query from the user, natural language rules are applied to the database (step 404). This is done by matching the query against the grammar files generated in step 214 of FIG. 2. Information contained in grammar files is used to generate a database query which is submitted to the database in the information extraction engine. The database executes a query and returns an output associated with the query. The result is then formatted (step 406). The formatting includes highlighting relevant portions of the text as well as summarizing the results in a natural language such as English. Next, the formatted response is sent to the user (step 408). (Appelt, col. 11, lines 26-37)

Appelt does no outputting of the query that was received as initial input to a search. This is the exact opposite of Applicant's claimed invention. Applicant's claimed invention receives no natural language query as input to a search. Applicant's claimed invention receives query text as an input to a search. Applicant's claimed invention outputs a prose rendition of the query text along with the search results.

Assuming there is a suggestion to combine Khan and Appelt, the resulting combination would merely produce a natural language summary of the results in response to a natural language query and *not* a prose rendition of the query text. Accordingly, claims 1, 14, 29 and 30 cannot be rendered obvious by Khan and Appelt.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as

an intent to concede any issue with regard to any claim, except as specifically stated in this

paper, and the amendment of any claim does not necessarily signify concession of

unpatentability of the claim prior to its amendment.

Enclosed is a $60.00 check for the Petition for Extension of Time fee. Please apply any

other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: March 22, 2005

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